JOSEPH & NORINSBERG, LLC

MEMO ENDORSED

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April 8, 2020

VIA ECF

The Hon. Edgardo Ramos United States District Court Thurgood Marshall U.S. Courthouse 40 Foley Square New York, New York 10007

Re: <u>Joanna Pedroza v. Ralph Lauren Corp.</u>

No. 19-cv-08639 (ER).

The application is X granted denied

Edgardo Ramos, U.S.D.J

Dated: April 8, 2020 New York, New York

Dear Judge Ramos:

We represent Plaintiff Joanna Pedroza ("Plaintiff" or "Ms. Pedroza") in the above-referenced employment discrimination action against Defendant Ralph Lauren Corp. ("Defendant"). We write now to respectfully request a one-week extension of time to submit Plaintiff's opposition to Defendant's partial motion to dismiss Plaintiff's claims, pursuant to Fed. R. Civ. P. 12(b)(1), from April 10, 2020 to April 17, 2020. This slight modification will not impact the current deadline for Defendant's reply, which will remain May 15, 2020, as per this Court's Match 27, 2020 Order. [Dkt. No. 26]. Counsel for Defendant, Matthew A. Steinberg, Esq., consents to this request.

A one-week extension of time is necessary, since the current deadline, April 10, 2020, falls on the second day of Passover, and the undersigned will not be working on April 9 and 10, 2020, in observance of Passover.

Accordingly, based on the foregoing, we respectfully request that this Court grant Plaintiff's request for a one-week extension of time to submit her opposition, from April 10, 2020 to April 17, 2020. Plaintiff's extension request will not impact any other dates or deadlines relating to this matter.

We thank the Court for its attention to this matter.

Respectfully submitted,

Chaya M. Gourarie, Esq.